

Transmittal and Escalation Protocol for Ethics Helpline Issues and Allegations

All Ethics Helpline issues and allegations are documented and logged upon receipt. Issues/allegations are reviewed and assessed for transmittal to the appropriate primary business line.

The primary business line receives a transmittal notice of the issue/allegation and a secondary business line may also be notified of the issue/allegation. In addition, depending on the nature of the issue/complaint, the Legal Office, the Office of Audit Services, or the Human Resources Division may be notified of the issue/allegation. The status of each report is monitored and tracked, with updates on resolution from the primary business line, every two weeks.

For issues/allegations involving Board members/representatives, or Board reportable staff, the Chief Compliance Officer has created the following escalation protocol.

Protocol for Chief Compliance Officer to Report Issues and Allegations Involving a Board Member/Representative or Board Reportable Staff

The Board's Statement of Governance Principles state that Board members shall at all times meet high ethical standards that exceed legal minimum and be responsible and accountable to members and beneficiaries.

The Chief Compliance Officer will document, log and report to the Board President or Board Vice President any instances or allegations of improper conduct involving a Board member/representative or Board reportable staff that are reported to the Office of Enterprise Compliance or received via the Ethics Helpline.

The report to the Board President will be transmitted confidentially and in writing. In the event the issue or allegation involves the Board President, the report will be confidentially transmitted to the Board Vice President in writing.

These reports will be monitored for status and resolution. The issue status will be included in the presentation of agenda items to the Finance Committee.